

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

ELIZABETH THOMAS

v.

MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC., *et al.*

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CASE NO.: 1:11-cv-3656

DISTRICT JUDGE GLEESON

NOTICE OF MOTION

To: Elizabeth Thomas, Plaintiff *pro se*
(via e-mail and certified mail, RRR)

To: Jeffrey Stark, Counsel for the Law Firm Defendants
(via e-mail and ECF)

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of Motion to Dismiss by Defendants The Dolan Company, American Processing Company, LLC, and NDeX West, LLC, the exhibits attached thereto, and all the prior proceedings herein, Defendants The Dolan Company, American Processing Company, LLC, and NDeX West, LLC will move before the Honorable Judge John Gleeson on March 28, 2012, at 10:00 am, or as soon thereafter as counsel can be heard, at 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(3), and/or 12(b)(6) dismissing the complaint against the moving defendants for lack of subject matter jurisdiction, improper venue, and/or failure to state a claim upon which relief can be granted, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that the plaintiff's response to this motion must be served on or before March 2, 2012.

Dated: February 10, 2012

Respectfully Submitted:

/s/ W. Zachary Hughes

W. Zachary Hughes

State Bar No. 4890091

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**COUNSEL FOR THE DOLAN COMPANY,
AMERICAN PROCESSING COMPANY, LLC,
AND NDEX WEST, LLC**